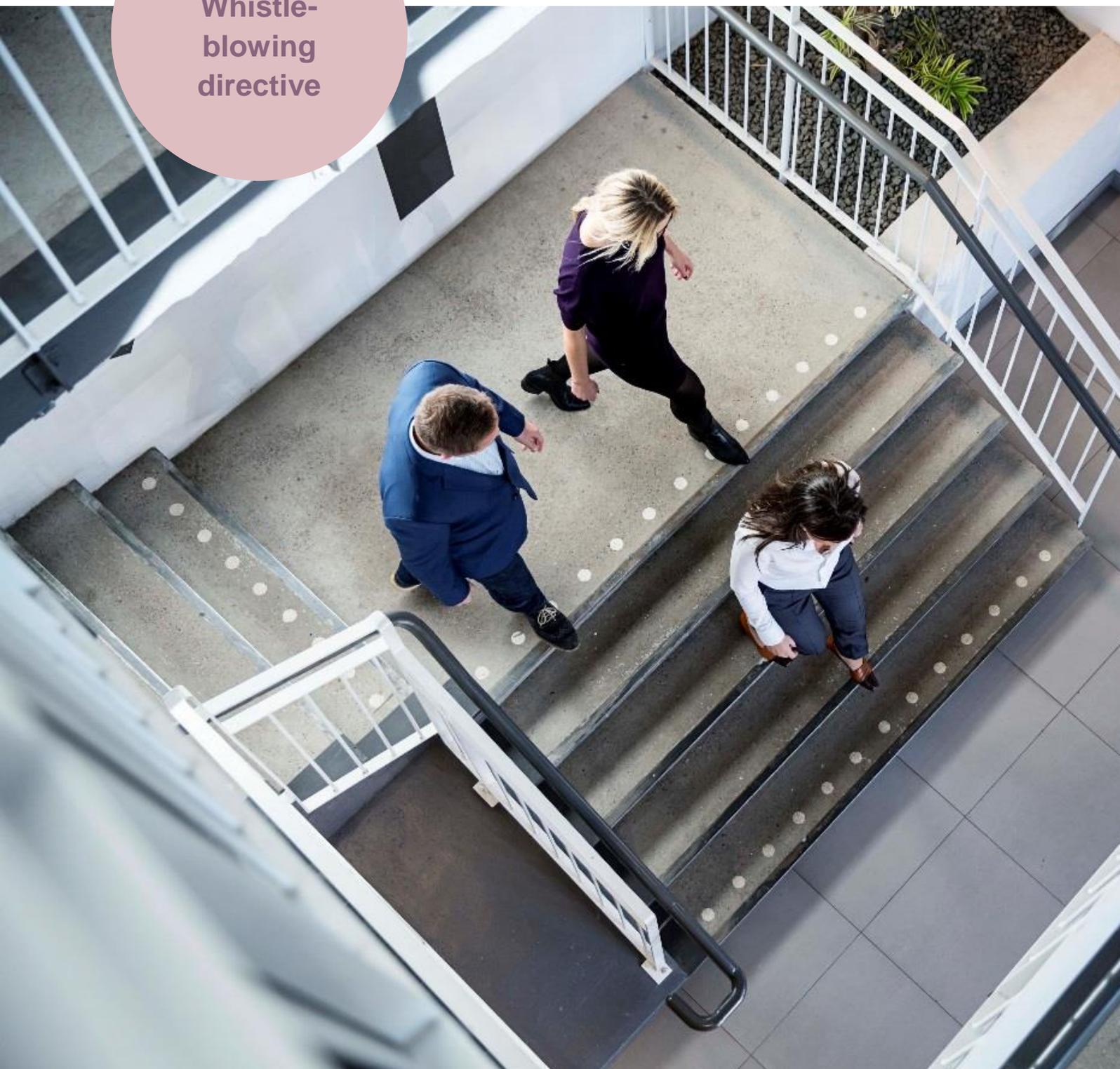


Internal
Whistle-
blowing
directive



1. Introduction

Arjo AB (publ) ("Arjo") is committed to the highest standards of ethical, moral and legal business conduct. Ethical business behaviour is the responsibility of every person in the company and is reflected not only in our relationships with each other but also with our customers, suppliers, shareholders, and other stakeholders. Arjo's Global Anti-Corruption Directive and related corporate policies are key components of our commitment to high standards of business and personal ethics in the conduct of our business.

However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness, integrity and accountability is essential in order to prevent such situations from occurring or to address them when they do occur. In line with this commitment we expect employees and other stakeholders to come forward and communicate any observed or suspected compliance issues and concerns as soon as possible, knowing that their reports will be taken seriously and be properly investigated and that their confidentiality will be respected.

This Whistleblowing Directive applies to all entities within the Arjo Group and is intended to provide an overall guidance for the reporting of concerns and to further encourage and enable employees to report matters of non-compliance. The Whistleblowing Directive highlights the various channels available to employees to raise concerns and receive feedback on matters reported and on any action to address the matters reported.

In addition to Arjo's internal reporting channels, Arjo has implemented a Whistleblowing System, provided by an external supplier that offers employees and external parties the possibility to file reports of serious misconduct by persons in key or leading position within Arjo in a secure and anonymous way.

Arjo encourages and expects all employees to report incidents of non-compliance using the appropriate reporting channels as outlined below.

2. Internal reporting channels

As a first step, employees should normally raise concerns with their immediate manager, local HR or other appropriate superior. If the employee does not have a local HR or suitable manager at hand, the Arjo Global Compliance & Risk Function should be contacted. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of the misconduct. Concerns such as poor or unfair management, inefficient systems or other operational feedback shall be communicated through the internal reporting channels.

3. The Whistleblowing System

The Whistleblowing System complements Arjo's internal reporting channels and is available for use on a voluntary basis.

3.1 What can be reported through the Whistleblowing System?

Only **serious misconduct** by **persons in key or leading position within Arjo** may be reported through the Whistleblowing System. For the purpose of this Whistleblowing Directive, Arjo considers the following matters to constitute reportable serious misconduct:

- act of corruption (for example conflicts of interest, bribery, unauthorised sponsorships & donations, excessive gifts & entertainment or facilitation payments);
- financial fraud (for example accounting manipulation, misappropriation of assets or dishonest statements);
- violation of competition laws (for example price fixing, exchange of price sensitive information or collusion with competitors);
- serious endangerment to environment, health and safety, including risks to the public as well as other employees; and
- breaches of law, treaties or other formal agreements (for example serious discriminatory practices, harassment, abuse of power and authority, use of child labour or other human rights violations).

3.2 How to raise a concern through the Whistleblowing System

Concerns will be raised in writing. Employees have to make a written report are invited to use the following format:

- The background and history of the concern (giving relevant dates);
- The reason you are particularly concerned about the situation;
- The extent to which you have personally witnessed or experienced the problem (provide documented evidence where possible).

Although employees are not expected to prove beyond reasonable doubt the truth of an allegation, it must be demonstrated that there are reasonable grounds for the concern.

Employees shall be thorough and precise but shall try, to the extent possible, to leave out sensitive personal data that is not directly necessary for the concern, e.g. revealing ethnic origin, political opinions, religious belief or information that concerns health and sexual life.

To ensure confidentiality and anonymity of whistle-blowers, disclosures made through the Whistleblowing System will be received by an external service provider. Disclosures can be made using any one of the following mediums of communications:

- Use of one [unique e-mail address]
- Access to the <https://report.whistleb.com/Arjo>

Description of the process (disclosures/reports prepared etc.).

The Whistleblowing System (Whistle B) enables anonymous reporting including a possibility for the Whistleblower to follow up on how the report is received and handled. The identity of an employee will only be provided to Arjo if the Whistleblower has given their verbal consent to the external service provider, Whistle B, to communicate their identity to Arjo.

Arjo's response to allegations

Arjo will act upon any concerns raised, regardless of which reporting channel being used.

Concerns will be investigated as quickly as possible. It may be necessary to refer a matter to an external advisor, which may result in an extension of the investigative process.

The investigation and the duration will also depend on the nature of the matters raised, the difficulties involved and the clarity of the information provided. If necessary, further information will be sought from the individual. The investigations will be handled in a confidential manner and will not be disclosed or discussed with any persons other than those with a legitimate right to such information. Appropriate feedback will be provided upon request by the Whistleblower.

The person subject to concern will be informed of the report as soon as possible and at the latest in conjunction with any measures taken in relation to him or her. However, the identity of the Whistleblower will not be disclosed.

Confidentiality and anonymity

Arjo will take all necessary steps to make sure that a concern reported through any reporting channel will be kept confidential.

There may be circumstances where Arjo is unable to investigate an anonymous report as further investigation may prove impossible if the investigator cannot obtain further information, give feedback, or find out whether the report was made in good faith. Arjo therefore encourages employees to identify themselves in order to handle the investigation in the most efficient way.

Acting in good faith

All reporting employees must act in good faith and must not make deliberately false accusations when reporting any concerns. Good faith is when a disclosure is made without malice or consideration of personal benefit and the complainant has a reasonable basis to believe the report to be true. Arjo recognises that the decision to report a concern can be a difficult one to make and is therefore committed to ensuring that an employee is protected for a disclosure made in good faith. No employee will suffer harassment, retaliation or adverse employment consequences as a result of a disclosure made in good faith.

Any employee who knowingly or recklessly makes false or misleading accusations that are not in good faith may be subject to disciplinary action.

Prevention of retaliation

Arjo will not tolerate any attempt to penalise, or discriminate against, an employee who has used the Whistleblowing System to report a genuine concern in good faith. Any such retaliation may be subject to disciplinary action.

Processing of personal data

Reports made through the Whistleblowing System often include information regarding individuals, so called *personal data*.

Arjo, and the Arjo Company where you are employed, are the data controllers of any personal data collected via the Whistleblowing System and are responsible to ensure that the personal data collected is processed in accordance with applicable laws and regulations on data protection.

The details of Arjo for purposes of its role as data controller are as follows:

Arjo AB (publ.) (org. number 559092-8064)
Hans Michelsensgatan 10
211 20 Malmö
Sweden
E-mail address: reception.sema3@getinge.com

The Data Protection Officer at Compliance officer Arjo AB

Any personal data collected via the Whistleblowing System will be processed for the purpose of administering and investigating any concerns raised, as described in this Whistleblowing Directive. The processing of personal data in the Whistleblowing System is based on a balance of interest test where Arjo's interest of obtaining the information has been weighed against the personal interest of any individual whose personal data may be processed in the system.

Arjo takes both technical and organisational security measures to protect the personal data processed. The personal data will only be processed by those individuals at Arjo who are involved in the investigation. Personal data may however be transferred to the police, other law enforcement authorities and, if necessary, other external advisors.

The personal data processed in the Whistleblowing System will not be retained longer than necessary. When an investigation is completed or the personal data is no longer needed for the investigation, all personal data will be deleted. Personal data will always, at the latest, be deleted within two months after the investigation is completed. All reports that are found to be ungrounded are immediately deleted. Superfluous personal data as well as sensitive personal data (see section 3.2 above) will not be processed.

When personal data pertaining to an individual is collected via the Whistleblowing System, the individual must be informed. If such information could jeopardise the investigation, information will be provided when it would no longer constitute a risk to the investigation.

Employees may, whenever they want, request confirmation on whether any personal data concerning the employee is processed in the Whistleblowing System or not. Arjo will, with the limitations mentioned above, provide such confirmation. Employees may also request a copy of any personal data undergoing processing. For any further copies requested, Arjo may charge a reasonable fee based on its administrative costs. A request for confirmation or a request for copies shall be directed to Arjo's Data Protection Officer.

Arjo will, at the request of an employee, rectify, block or erase personal data that is incorrect or that has otherwise not been processed in accordance with applicable laws and regulations. The employee is also entitled to extract and use the personal data elsewhere (the right to data portability) and may file a complaint regarding Arjo's handling of personal data to the applicable Supervisory Authority.

Assistance and questions

Any questions related to this guideline should be directed to the employee's immediate manager or Arjo Global Compliance & Risk Function or EVP HR & CSR